UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re TREMONT SECURITIES LAW, STATE LAW AND INSURANCE LITIGATION

Master Docket No. 08 Civ. 11117 (TPG)

This document relates to:

THE INSURANCE ACTION, 09 Civ. 557 (TPG), specifically to:

CAYMAN NATIONAL TRUST COMPANY, LTD., AS TRUSTEE OF THE INTERNATIONAL DAD TRUST,

Plaintiff,

-against-

TREMONT OPPORTUNITY FUND III, L.P., et al.,

Defendants.

11 Civ. 1687 (TPG)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon this Court's Opinion dated May 23, 2012 (the "Opinion"), the accompanying memorandum of law, and all prior papers and proceedings herein, defendants Tremont Opportunity Fund III, L.P. and Tremont International Insurance Fund L.P. (the "Funds") will move this Court, before the Honorable Thomas P. Griesa, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, for an Order pursuant to Local Rule 6.3: (i) granting the Funds' motion for reconsideration and, upon reconsideration, entering an order dismissing the First and Second Causes of Action in the Complaint as against the Funds; and (ii) for such other and further relief as this Court may deem just and proper.

Dated: New York, New York June 6, 2013

TANNENBAUM HELPERN SYRACUSE & HIRSCHTRITT LLP

By: /s/ David J. Kanfer

Ralph A. Siciliano siciliano@thsh.com Jamie B.W. Stecher stecher@thsh.com David J. Kanfer kanfer@thsh.com 900 Third Avenue New York, New York 10022 (212) 508-6700

Attorneys for Defendants Tremont Opportunity Fund III, L.P. Tremont International Insurance Fund L.P.